

FACILITY STATUS CHANGE FORM

Date Submitted: June 12, 2014 Originator: Chris Strand Phone: 554-2720	Area: 300 Area Facility ID: 320 & 320BA Action Memorandum: Action Memorandum #3	Control #: D4-300-059-1
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This form documents agreement among the parties listed below on the status of the facility D&D operations and the disposition of underlying soil in accordance with the applicable regulatory decision documents.

Section 1: Facility Status

- ☒ All D4 operations required by action memo complete.
- ☐ D4 operations required by action memo partially complete, remaining operations deferred.

Description of Completed Activities and Current Conditions:

Deactivation: Utility isolations were performed on the facility prior to beginning facility decontamination.

The following hazardous materials were removed prior to facility demolition: lead, asbestos, batteries, Freon, oil, light ballasts, HEPA filters and miscellaneous construction materials. Hazardous material removal and waste disposition was performed in accordance with *Removal Action Work for 300 Area Facilities*, DOE/RL-2004-77, Revision 2 (RAWP).

Demolition: Above-grade demolition of the 320 and the 320BA facilities were completed in August and September of 2011. Below-grade demolition of the 320 foundation walls above 3-feet was completed in March of 2012. The above-grade building debris were removed and disposed of at ERDF. The 320 basement walls and floor slab were left following EPA approval (See attachment 5). Process sewer piping below the slab, the process sewer sump and condensate sump were removed. Excavated soil was tested and used as backfill (see test results and EPA approval in attachment 6). The demolition was performed under Radiological and Industrial Hygiene controls.

Removal of the 320BA slab and a portion of the southeast corner of the 320 Building foundation were originally deferred because of interference by an active 13.8 KV underground electrical line. In 2014 this line was permanently de-energized, which eliminated the interference and allowed removal of the deferred portions of both facilities. The 320BA slab and southeast corner of the 320 foundation were demolished, loaded out, and backfilled in May 2014.

Description of Deferral (as applicable):

None.

Section 2: Underlying Soil Status

- ☐ No waste site(s) present. No additional actions anticipated.
- ☒ Documented waste site(s) present. Cleanup and closeout to be addressed under Record of Decision.
- ☐ Potential waste site discovered during D4 operations. Waste site identification number <to be> assigned.

Cleanup and closeout to be addressed under Record of Decision.

Description of Current/As-Left Conditions:

The 320BA slab and the southeast corner of the 320 building were demolished and backfilled with clean material. The 320 basement walls and floor remain. Portions of the 320 concrete basement floor were removed to access process sewer piping. A Civil survey and GPERS survey are included as attachments 3 and 4, respectively. No GPERS was conducted after removal of the 320BA slab and southeast corner of the 320 Building foundation. Soils were evaluated before backfill, no anomalies noted.

Identification of Documented Waste Site(s) or Nature of Potential Waste Site Discovery (as applicable):

300-15, Process Sewer - was removed to the limits of the excavation layback, but segments remain in the area.

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The following rejected UICs were decommissioned during demolition:

- UIC - 300-241, 320 Building Irrigation Line Effluent, Misc. Stream #79 - removed and backfilled.
- UIC - 300-88, 320 Building Irrigation Line Effluent, Misc. Stream # 626 - removed and backfilled.
- UIC - 300-89, 320 Building Irrigation Line Effluent, Misc. Stream # 627 - removed and backfilled.
- UIC - 300-90, 320 Building Irrigation Line Effluent, Misc. #628 - removed and backfilled.

UIC - 300-91, 320 Building, Misc. Stream # 350 - was not found.

Section 3: List of Attachments

1. Facility information (building history, characterization and identification of documented waste sites).
2. Project photographs.
3. Civil Survey
4. GPERS Survey
5. EPA approval to leave basement walls and slab.
6. EPA approval to use excavated soil for clean backfill.

DOE-RL

Date

Lead Regulator



EPA



Ecology

Date

DISTRIBUTION:

EPA: Dennis Faulk, B1-46

Ecology: Rick Bond, H0-57

DOE: Rudy Guercia, A3-04

Document Control, H0-30

Administrative Record, H6-08 (300-FF-2 OU)

SIS Coordinator: Ben Cowin, H4-22

D4 EPL: Chris Strand, L7-10

Sample Design/Cleanup Verification: Theresa Howell, H4-23

FR Engineering: Eric Ison, L4-39

FR EPL: Chris Strand, L5-45

Attachment 1: Facility Information

Building History:

The 320 Building, constructed in 1966, was known as the Physical Sciences Laboratory. A large addition was constructed in the 1980's increasing the building to 144' x 84' (25,000 square feet). The building was constructed of concrete and steel framing and contained 22 laboratories, offices, restrooms, and supply rooms.

The 320 Building was located at the intersection of Cypress Street and Nebraska Avenue in the southern portion of the 300 Area. Throughout its history, the 320 building produced small amounts of low level wastes and was not connected to the radioactive liquid waste sewer (RLWS). The original work performed in the 320 building included gamma ray spectrographic analysis, physical measurements with instruments and various types of radiochemical separations involving low level radionuclides. Radiometric techniques, new mass spectrometric techniques, combined atomic absorption/mass spectrometric analysis, laser-based spectrometric techniques and many classified programs were developed in the 320 Building.

The 320BA Boiler Annex was located adjacent to the southeast corner of the 320 Building. Constructed in 1997, the 320BA boiler annex was a pre-engineered metal building on a concrete slab that measured approximately 24' x 30'. 320BA housed a gas fired package boiler system to provide heat for 330. The boiler annex was electrically heated with natural gas, water and sewer connections. Inside floor drains and intermittent blowdown separators drained to a sump that was tied to the process sewer.

Building Characterization:

Table 1 summarizes the industrial hygiene, radiological control, and asbestos samples collected in the 320 and 320BA Buildings.

Table 1. Summary of Characterization Surveys at 320 and 320BA.

Type	Date	Documented In	Results Summary
Pre-Demolition			
Asbestos	June 13, 2011	CNN # 159189	ACM was identified in floor tiles/sheeting, mastic, counter tops, fire doors, piping gaskets, hard pipe elbows and plaster.
IH Surveys and Beryllium Characterization	May 10, 2011	CNN (Be, Cd, Cr, Pb) # 158884.	No contamination above action levels.
	February 24, 2011	CNN # 154535.	Identified potential hazards with asbestos, Hg, Pb and PCB ballasts.
Radiological Surveys	June 14, 2011 June 23, 2011 March 7, 2012	RSR-300PS-11-2730 RSR-300PS-11-2907 ERS-300PS-12-0005	One area of the floor was discovered with fixed contamination. No other radiological contamination was identified.

Associated WIDs sites:

The following "Rejected" Underground Injection Control (UICs) wells were excavated and backfilled (decommissioned) during the 320 Building demolition:

UIC – 300-241	320 Building Irrigation Line Effluent, Misc. Stream # 790
UIC – 300-88	320 Building Irrigation Line Effluent, Misc. Stream #626
UIC – 300-89	320 Building Irrigation Line Effluent, Misc. Stream #627
UIC – 300- 90	320 Building Irrigation Line Effluent, Misc. Stream #628
UIC – 300-91	320 Building, Misc. Stream # 350 was not found
300-15	Process sewer was removed to the limits of the layback excavation.

Anomalies Discovered During Demolition.

No anomalies were discovered during the demolition of the 320 Building or the 320BA. No anomalies were discovered during subsequent removal of the 320BA slab and southeast portion of the 320 Building foundation.

Attachment 2: Project Photographs

Photo 1: Looking southeast at the 320 Building on August 22, 1968.



Photo 2. Looking northeast at the 320 Building & 320BA on August 16, 2011.

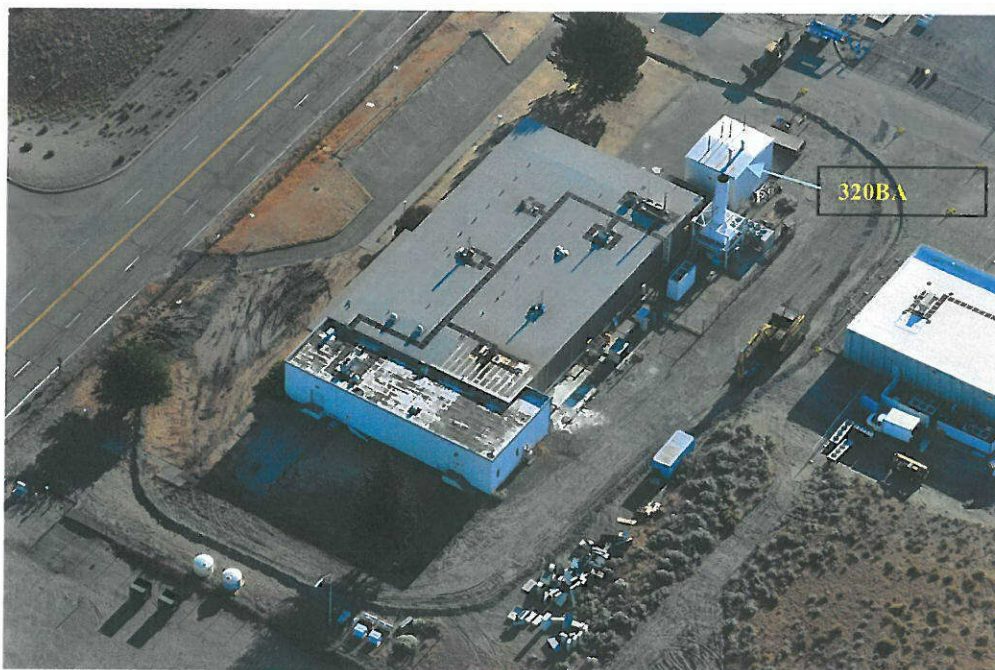


Photo 3. Looking east at the 320 Building basement and 320BA Slab on March 8, 2012.



Photo 4. Photo of the southwest corner of the 320 Building slab left due to utility interference.



Photo 5. Looking southwest at 320BA on February 7, 2011.



Photo 6. 320BA Slab on November 16, 2011.



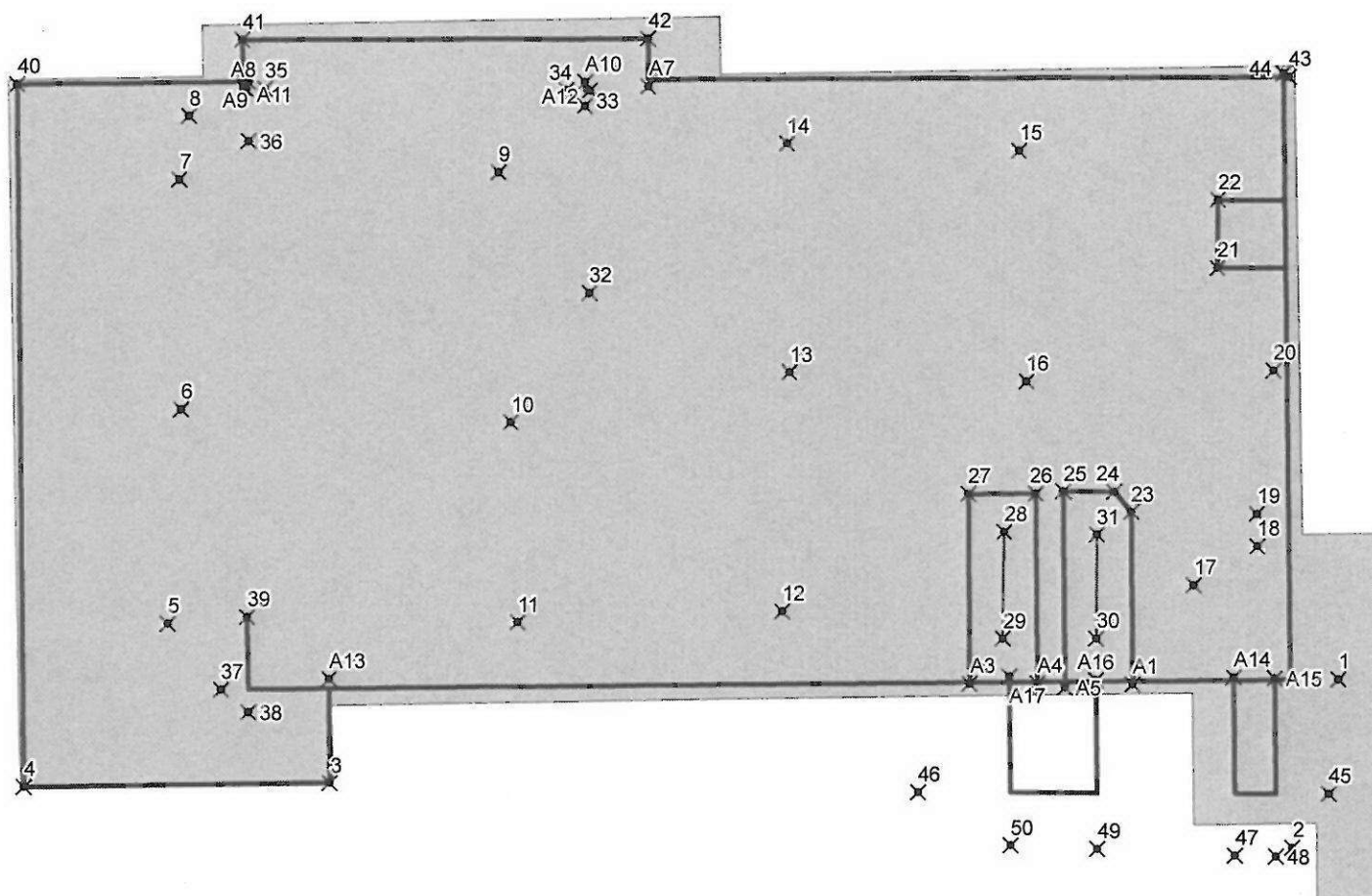
Photo 7. 320 & 320BA after backfill. Looking northwest on April 29, 2012.



**Photo 8. 320 Foundation & 320BA slab after backfill.
Looking northwest on June 10, 2014.**



Attachment 3: Civil Survey.



GPS Point Data

- × See GPS Survey Report for Point Details
- 320 Building Foundation and Walls
- Building Location Pre-Demolition

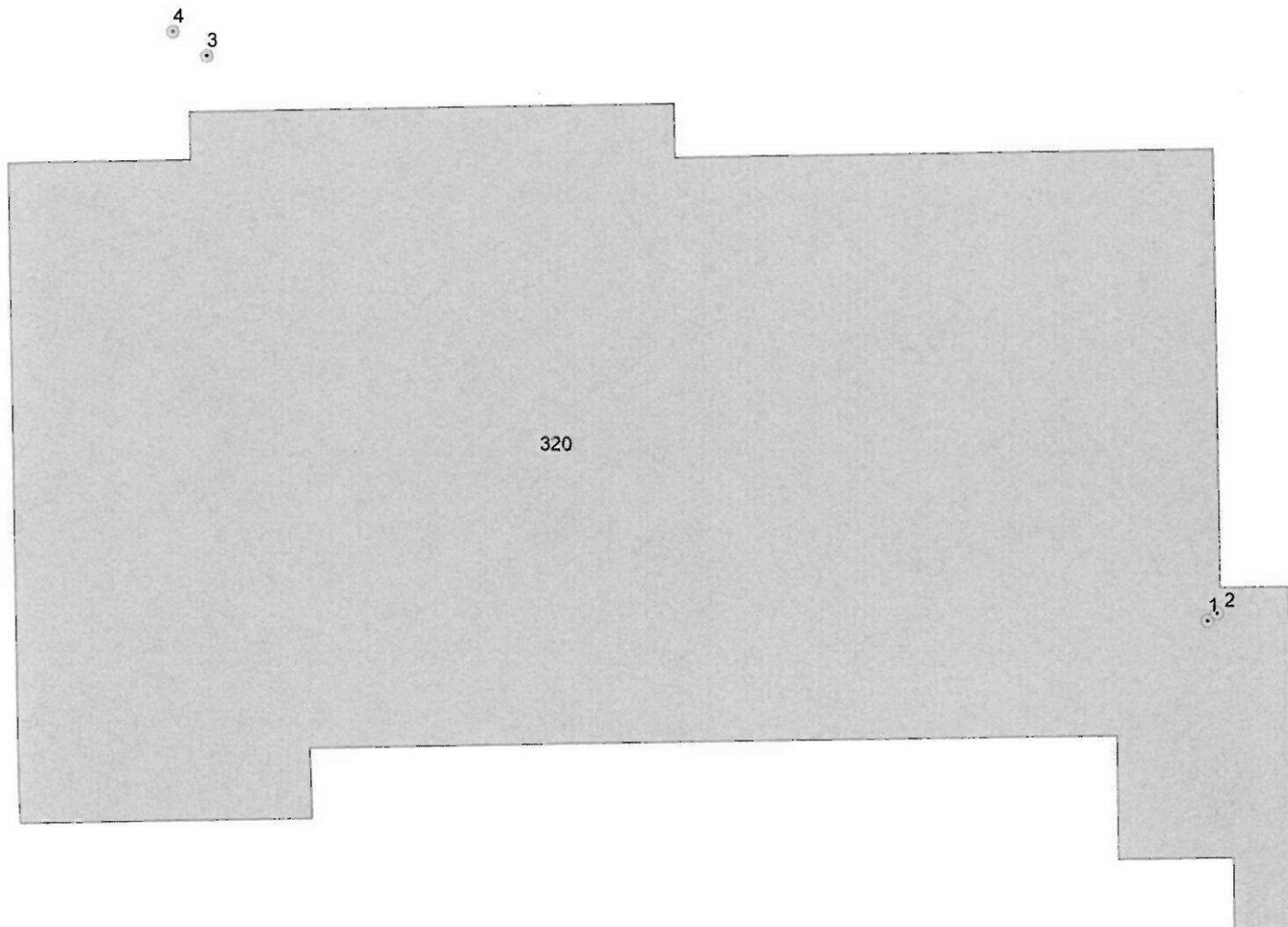
US State Plane 1983
 Zone: Washington South 4602;
 NAD83, NAVD88; Units are in Meters



GPS Post-Demo Survey for the 320 Building Foundation and Walls (Remaining)



0 5 10 20 Meters

WCH:01/26/12:V:\maayel\ArcMap\300A\320bldg.mxd, 5:13:19 PM

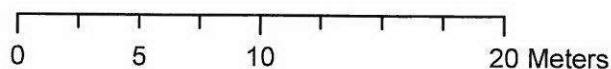


-  Building Location Pre-Demolition
-  Cut Pipe Locations

Name	Feat_Code	Northing	Easting	Elevation
1	Fire Water -6in Steel	115491.31	593834.40	120.759
2	Process Sewer - 4in Steel	115491.65	593834.81	120.536
3	Sanitary Sewer - Clay Pipe	115516.38	593789.44	120.917
4	Process Sewer - 6in Steel	115517.45	593787.92	120.791

US State Plane 1983
 Zone: Washington South 4602;
 NAD83, NAVD88; Units are in Meters

GPS Post-Demo Survey for the 320 Building Cut Pipe Locations

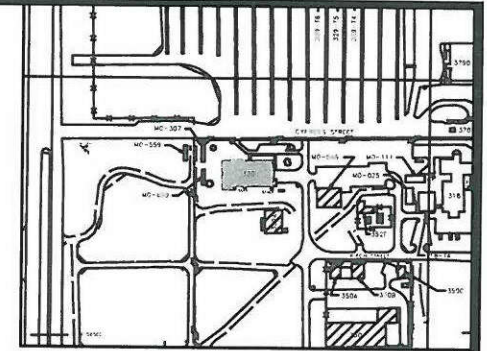


WCH:01/26/12:V:\maayelArcMap\300A\320bldg.mxd, 5:13:19 PM

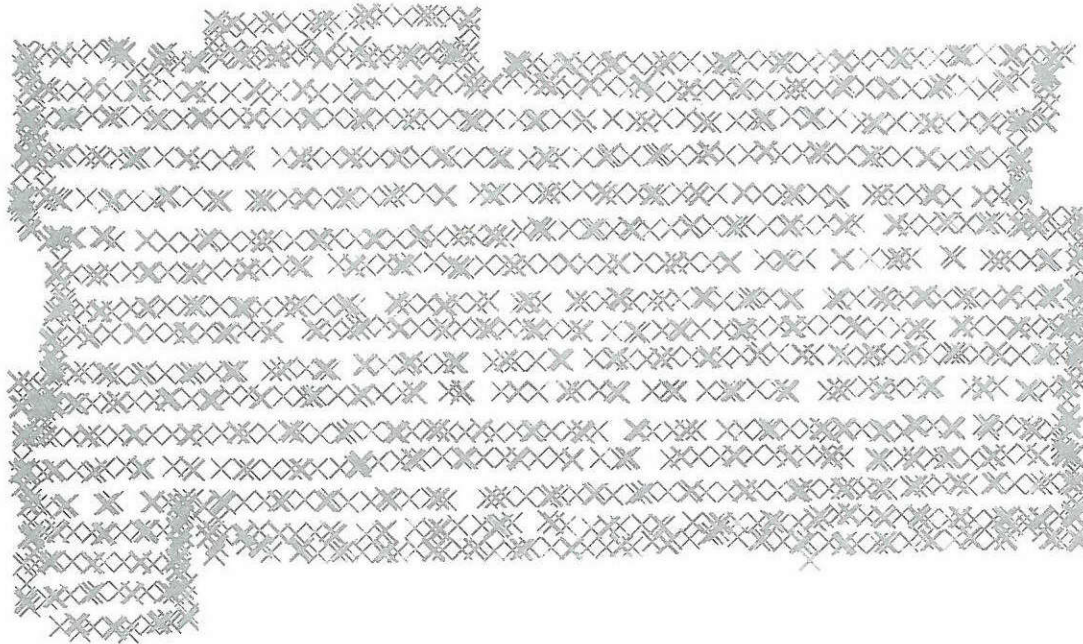
Attachment 4: GPERS Survey.



↑
Bkg Location
854 meters N
1306 cpm



Site View



Copy

Legend

NET CPM

- × <1959
- 1959 - 5000
- 5000 - 10000
- 10000 - 25000
- 25000

Summary Statistics

Coverage File: D4304
Number of Data Pnts: 4009
Type of Survey: gamma
Max GCPM: 2253
Avg Bkg CPM: 1306
Survey Date: 10/31/2011
Area Surveyed: 1300 m²
Project File: ESRFRM110207
Pdf File: ESRFRM110207C

300 D4 Field Remediation 300/320 Slab GPERS Radiological Survey Gamma Track Map

0 2 4 6 8 10

Meters



**EBERLINE
SERVICES**
HANFORD, INC.

Survey Map Prepared By Bruce Coomer, ESI

Attachment 5: EPA approval to leave basement walls and slab.

Harrie, John P

From: Strand, Christopher P
Sent: Thursday, March 08, 2012 6:47 AM
To: Harrie, John P
Subject: FW: Completion of 320 Removal Actions

This correspondence will need to be attached to the 320 FSCF.

-----Original Message-----

From: Guercia, Rudolph F (Rudy) [mailto:rudolph.guercia@rl.gov]
Sent: Tuesday, March 06, 2012 11:02 AM
To: 'Larry Gadbois'
Cc: Strand, Christopher P
Subject: RE: Completion of 320 Removal Actions

This is acceptable for the purposes of the RCCC.

R. F. Guercia, Field Engineering
U.S. Dept. of Energy, Richland Operations Office
PH: (509) 376-5494
Fax: (509) 373-0726

-----Original Message-----

From: Larry Gadbois [mailto:Gadbois.Larry@epamail.epa.gov]
Sent: Tuesday, March 06, 2012 10:44 AM
To: Guercia, Rudolph F (Rudy)
Cc: Strand, Christopher P
Subject: Re: Completion of 320 Removal Actions

This looks acceptable to EPA.

--Larry--

From: "Strand, Christopher P" <cpstrand@wch-rcc.com>
To: Larry Gadbois/RL0/USEPA/US@EPA, "Guercia, Rudolph F" <rudolph.guercia@rl.doe.gov>
Date: 03/06/2012 10:37 AM
Subject: Completion of 320 Removal Actions

Larry, Rudy,

Provided for EPA and DOE concurrence is the proposed path forward to complete removal actions for the 320 Building in the 300 Area. This methodology is consistent with Sections 2.5 and 2.6 of the Removal Action Work Plan for 300 Area Facilities, DOE/RL-2004-77, Rev 2.

Please call if there are any questions.

Thanks,

Chris
554-2720

320 Physical Sciences Building History

The 320 Building was constructed in 1966 and served as a low-level analytical research

laboratory until being declared excess. The building was turned over to WCH for deactivation and demolition in February of 2011.

Current 320 Site Conditions:

The 320 Building has undergone demolition with the below-grade basement remaining in place. Process sewer piping is being removed from in and under slab by machine trenching. Additionally, two sumps (process and sanitary sewer) located in the basement will be removed via machine excavation. A layback has been established around the external basement walls to mitigate collapse hazards for work the balance of being performed. Process sewer segments are also being removed from the foundation excavation layback.

Remaining Actions for Closure:

Following removal of all process sewer piping and sumps, below-slab and layback soils will be sampled to evaluate suitability for use as back fill. One composite sample each for both trench and layback soils will be performed and will be comprised of 30 aliquots each, collected at even intervals from the spoils face. Analysis will include the full suite of 300-FF-2 contaminants of concern. If analytical results for the soils pass remedial action goals they will be used as part of below-grade fill material with the balance imported from Pit 6. Results of sampling will be provided to DOE and EPA via separate correspondence.

The remaining basement slab and walls will be left in place, with the walls demolished to 3 feet below-grade to support backfill. Both layback and trench excavations will be visually inspected for any anomalous conditions and final hand held radiological surveys will be performed. Final closure will consist of backfill to general area grade with all removal actions documented on a Facility Status Change Form (to include radiological and sampling results). This approach is supported by completion of comprehensive GPERS surveys of the basement slab, and MARSSIM surveys of vertical wall surfaces that identified no radiological contamination. GPERS track maps and RSR references are attached.

Attachment 6: EPA approval to use excavated soil for clean backfill.

Harrie, John P

From: Larry Gadbois [Gadbois.Larry@epamail.epa.gov]

Sent: Tuesday, March 20, 2012 9:26 AM

To: Guercia, Rudolph F

Cc: Harrie, John P; Strand, Christopher P

Subject: RE: Completion of 320 Removal Actions

EPA approves this data as sufficient to use these two soil stockpiles for backfill.

--Larry--

"Strand, Christopher P" ---03/20/2012 08:24:09 AM---Larry, Rudy, Per the commitment below, attached is the Sample Results Summary for the

From: "Strand, Christopher P" <cpstrand@wch-rcc.com>
To: Larry Gadbois/R10/USEPA/US@EPA, "Guercia, Rudolph F" <rudolph.guercia@rl.doe.gov>
Cc: "Harrie, John P" <jpharrie@wch-rcc.com>
Date: 03/20/2012 08:24 AM
Subject: RE: Completion of 320 Removal Actions

Larry, Rudy,

Per the commitment below, attached is the Sample Results Summary for the 320 Building excavation spoils. An evaluation of data results for the two samples show no Remedial Action Goals were exceeded. EPA and DOE concurrence is requested for use of the excavated soils as basement fill.

Thanks,

Chris
554-2720

-----Original Message-----

From: Larry Gadbois [<mailto:Gadbois.Larry@epamail.epa.gov>]

Sent: Tuesday, March 06, 2012 10:44 AM

To: Guercia, Rudolph F

Cc: Strand, Christopher P

Subject: Re: Completion of 320 Removal Actions

This looks acceptable to EPA.

--Larry--

From: "Strand, Christopher P" <cpstrand@wch-rcc.com>
To: Larry Gadbois/R10/USEPA/US@EPA, "Guercia, Rudolph F" <rudolph.guercia@rl.doe.gov>
Date: 03/06/2012 10:37 AM
Subject: Completion of 320 Removal Actions

4/30/2012

Larry, Rudy,

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Chris
554-2720

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[attachment "320 soil sample results 3-19-12.doc" deleted by Larry
Gadbois/R10/USEPA/US]

320 Building Soil Sampling Results – March 19, 2012

Below-grade demolition of the 320 Building generated approximately 2,000 cubic yards of soil during basement layback and process sewer pipe removal.

Two soil stockpiles were staged within the building foot print area (BFA):

- One stockpile is comprised of soil material excavated from the sides of the building to relieve lateral stress from foundation walls during demolition, and
- A smaller stockpile that was comprised of soil removed from below the building's basement slabs during sewer pipe removal.

On March 6 & 7, 2012, a composite sample was collected from each of the two soil stockpiles. Each composite was made up of a 30 aliquot samples collected at even intervals along the face of the two stockpiles.

1. J1NLJ8 – 320 basement soil stockpile.
2. J1NLJ9 – 320 perimeter soil stockpile.

The samples were submitted under chain of custody documentation to Lionville and Eberline laboratories and analyzed for:

- Gross Alpha & Beta,
- Isotopic Radionuclides
- Strontium, Technicium-99, Carbon-14, Tritium and Nickel-63,
- ICP Metals, Hex-Chromium and total Cyanide,
- IC Anions, Sulfides,
- TPH diesel and oil,
- Alcohols, Glycols & Ketones,
- VOAs, Semi-VOAs and PCBs.

Laboratory results are indicated on the tables below. The tables list only detectable results that were reported and were subsequently compared to the remedial action goals (RAGs) presented in the Remedial Design Report/Remedial Action Work Plan for the 300 Area (RDR/RAWP) – Table 2.1.

Conclusions

Based on both the RCF and laboratory results, the two soil stockpiles did not exhibit radionuclide activity above background levels. As shown in the tables below, laboratory results indicate that the soil does not contain contamination above the 300 Area RAGs for the analytes tested. This data is being used to document EPA concurrence to use the two soil stockpiles for backfill of the 320 Building.

Table-1 320 Soil Sample Results for J1NLJ8 – Basement Soil Stockpile – Radionuclides							
COC/COPC	Kd	Background	Remedial Action Goals (mg/kg)				
			Maximum Result (pCi/g)	Industrial Direct Exposure	Residential Direct Exposure	Residential Protective of Groundwater	Residential Protective of the River
Gross Alpha	NA	NA	4.87	NA	NA	NA	NA
Gross Beta	NA	NA	14.3	NA	NA	NA	NA
Carbon 14	200	NA	0.766	82	8.7	NA	NA
Thorium 228	200	NA	0.692	10.8	2.3	NA	NA
Thorium 232	200	1.3	0.590	4.8	1.0	NA	NA
Total Uranium	8.9	2.27	1.26	350	56.1	267	37
Uranium 233/234	8.9	1.1	0.398	167	27.2	127.4	17.9
Uranium 235	8.9	0.11	0.028	16	2.7	13.3	1.8
Uranium 238	8.9	1.1	0.416	167	26.2	127.4	17.3
Potassium 40	NA	NA	13.8	NA	NA	NA	NA
Radium 226	NA	NA	0.346	NA	NA	NA	NA
Radium 228	NA	NA	0.590	NA	NA	NA	NA

Table-3 320 Soil Sample Results for J1NLJ8 – Basement Soil Stockpile – Chem Data							
COC/COPC	Kd	Background	Remedial Action Goals (mg/kg)				
			Maximum Result (mg/kg)	Industrial Direct Exposure	Residential Direct Exposure	Residential Protective of Groundwater	Residential Protective of the River
Arsenic	3	6.5	2.48	58	20	20	20
Barium	25	132	66.8	4,900	1,600	200	400
Beryllium	790	1.51	0.224	104	10.4	1.51	1.51
Boron	3	NA	0.900	700,000	16,000	320	NA
Cadmium	30	0.81	0.076	139	13.9	0.81	0.81
Chromium	200	18.5	7.98	5.25E+06	120,000	18.5	18.5
Cobalt	50	15.7	5.54	1,050	24	15.7	NA
Copper	22	22	10.5	130,000	2,960	59.2	22
Lead	30	10.2	3.13	1,000	353	10.2	10.2
Lithium	50	33.5	6.11	7,000	160	33.5	NA
Manganese	50	512	281	165,000	3,760	512	512
Molybdenum	20	NA	0.354	17,500	400	8	NA
Nickel	65	19.1	9.15	70,000	1,600	19.1	27.4
Strontium	25	NA	20.3	2.10E+06	48,000	960	NA
Tin	130	NA	1.54	2.1E+06	48,000	960	NA
Vanadium	1,000	85.1	52.0	24,500	560	85.1	NA
Zinc	30	67.8	41.3	1.05E+06	24,000	480	67.8
Sulfate	0	237	85.4	NA	NA	25,000	NA
Nitrate/Nitrite-N	0	11.8/NA	0.64	350,000	8,000	100	200
ButylBenzylPhthalate	13.8	NA	0.571	700,000	16,000	320	250

Table-2 320 Soil Sample Results for J1NLJ9 – Perimeter Wall Soil Stockpile – Radionuclides							
COC/COPC	Kd	Background	Remedial Action Goals (mg/kg)				
			Maximum Result (pCi/g)	Industrial Direct Exposure	Residential Direct Exposure	Residential Protective of Groundwater	Residential Protective of the River
Gross Alpha	NA	NA	7.87	NA	NA	NA	NA
Gross Beta	NA	NA	16.6	NA	NA	NA	NA
Carbon 14	200	NA	1.10	82	8.7	NA	NA
Thorium 228	200	NA	0.725	10.8	2.3	NA	NA
Thorium 232	200	1.3	0.797	4.8	1.0	NA	NA
Total Uranium	8.9	2.27	1.24	350	56.1	267	37
Uranium 233/234	8.9	1.1	0.394	167	27.2	127.4	17.9
Uranium 238	8.9	1.1	0.436	167	26.2	127.4	17.3
Potassium 40	NA	NA	14.8	NA	NA	NA	NA
Radium 226	NA	NA	0.414	NA	NA	NA	NA
Radium 228	NA	NA	0.658	NA	NA	NA	NA

Table-4 320 Soil Sample Results for J1NLJ9 – 320 Perimeter Wall Soil Stockpile – Chem Data							
COC/COPC	Kd	Background	Remedial Action Goals (mg/kg)				
			Maximum Result (mg/kg)	Industrial Direct Exposure	Residential Direct Exposure	Residential Protective of Groundwater	Residential Protective of the River
Arsenic	3	6.5	2.53	58	20	20	20
Barium	25	132	59.9	4,900	1,600	200	400
Beryllium	790	1.51	0.236	104	10.4	1.51	1.51
Boron	3	NA	0.841	700,000	16,000	320	NA
Cadmium	30	0.81	0.0903	139	13.9	0.81	0.81
Chromium	200	18.5	9.16	5.25E+06	120,000	18.5	18.5
Cobalt	50	15.7	4.86	1,050	24	15.7	NA
Copper	22	22	10.3	130,000	2,960	59.2	22
Lead	30	10.2	2.78	1,000	353	10.2	10.2
Lithium	50	33.5	6.91	7,000	160	33.5	NA
Manganese	50	512	231	165,000	3,760	512	512
Molybdenum	20	NA	0.362	17,500	400	8	NA
Nickel	65	19.1	7.76	70,000	1,600	19.1	27.4
Strontium	25	NA	20.2	2.10E+06	48,000	960	NA
Tin	130	NA	1.39	2.1E+06	48,000	960	NA
Vanadium	1,000	85.1	42.9	24,500	560	85.1	NA
Zinc	30	67.8	73.7	1.05E+06	24,000	480	67.8
Sulfate	0	237	67.2	NA	NA	25,000	NA
Nitrate/Nitrite-N	0	11.8/NA	2.84	350,000	8,000	100	200
Motor Oil	50	NA	13.5	200	200	200	200